Rocky Flats Plant

4-I07-779ECMP

REVISION 0

BUILDING 779 COMPLEX WASTE AND ENVIRONMENTAL COMPLIANCE GUIDE

APPROVED BY Pat Kneale / P. Kneale / 6-29-94
Building 779 Operations Manager — Print Name — Date

States that to the best of my knowledge, the necessary and sufficient Requirements, Codes, and Standards are met.

Responsible Organization Building Deactivation Effective Date 7-05-94

CONCURRENCE BY THE FOLLOWING DISCIPLINES IS DOCUMENTED IN THE PROCEDURE HISTORY FILE

Assembly Technology
Decontamination and Decommission Technology
Environmental Coordinator
Environmental Program Manager
Residue Treatment Technology

USE CATEGORY 4

ORC review not required

The following have been incorporated in this revision
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1. PURPOSE

This guide provides guidelines to ensure that all environmental and waste operations within the Building 779 Complex will be conducted in a safe manner which complies with applicable laws, Department of Energy (DOE) orders, and regulations. This guide prescribes the controls for ensuring compliance with requirements for the generation, storage, and movement of hazardous, low-level, low-level mixed, transuranic, transuranic mixed, residue, and residue mixed waste packages or containers within the Building 779 Complex, areas of responsibility

This is a living progressive document that is subject to change due to legal requirements and the maturity of environmental regulations knowledge of facility personnel

2. SCOPE

This guide applies to all personnel in the Building 779 Complex

This guide addresses the following topics.

- Training
- Administrative situations
- Environmental Coordinator (EC) Central File System
- Hazardous Resource Conservation and Recovery Act (RCRA) or nonhazardous waste
- Toxic Substances Control Act (TSCA)
- Superfund Amendments And Reauthorization Act-Title III (SARA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
- National Environmental Policy Act (NEPA)
- Clean Air Act (CAA)
- Clean Water Act (CWA)
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- Underground Storage Tanks (UST)

This guide consists of a summary of EC Information File contents and general information on environmental regulations and requirements, as applicable to administrative and waste packaging situations

2. SCOPE (continued)

This guide is used only as an administrative guidance document. All waste packaging, handing, and transportation activities are performed by specific approved implementing procedures

3. DEFINITIONS AND ACRONYMS

3.1 Definitions

Air Pollution Emission Notice (APEN). APENs are an air emission reporting and inventory requirement under the provisions of Colorado Department of Health (CDH), Air Pollution Control Division (APCD), Regulation Number 3

Building 779 Complex. The complex consisting of the following buildings and surrounding areas 705, 706, T706A, 727, 729, 782, 783, 784, 785, 786, 787, 779, T779A, 779A, and 779B

Clean Air Act (CAA). The act that provides the regulatory vehicle for prevention control of discharges into the air of substances which may be harmful to the public health or natural resources

Clean Water Act (CWA). The act that provides the regulation of the discharge of nontoxic and toxic pollutants into the surface water by municipal sources, industrial sources, and other specific and nonspecific sources.

Colorado Hazardous Waste Regulations. The rules promulgated by the State of Colorado which govern the management of hazardous waste. The rules in the Code of Colorado Regulations (CCR) 6 CCR 1007-3, Colorado Hazardous Waste Regulations, Parts 2, 99, 100, and 260 through 268 are essentially equivalent to the regulations promulgated by the U S Environmental Protection Agency (EPA) in the Code of Federal Regulations (CFR) 40 CFR, Solid Wastes, Sections 260 through 268 under the RCRA

3.1 Definitions (continued)

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Commonly known as Superfund A program developed to identify sites where hazardous substances have been, or might be, released into the environment; to ensure that the hazardous substances are cleaned up by responsible parties or the government, to evaluate damages to natural resources, and to create a claims guide for parties who have cleaned up sites or spent money to restore natural resources

Discovered Container. A receptacle containing a substance or mixture of substances of an undetermined hazard requiring identification through process knowledge or sample analysis

Empty Waste Container. A waste container having the following characteristics:

- The waste container has all waste removed by practices commonly employed to remove materials from that type of container (for example, pouring).
- The waste container has no more than 2 5 cm (1 in) of residue remaining on the bottom of the container.
- The waste container has no more than 3% by weight of the total capacity of the container remaining in the waste container if the container is less than or equal to 110 gal in size
- The waste container has no more than 0 3% by weight of the total capacity of the container remaining in the container if the container is greater than 110 gal in size.

Excess Chemicals. Chemicals having the following characteristics

- The chemical is in the original container or an approved substitute
- The integrity of the container for the chemical has not been compromised (that is, no rust, cracks, bulges, or tears)
- The chemical has not incurred degradation or contamination
- The original manufacturer's label or a Rocky Flats Plant (RFP)-approved substitute is affixed and legible
- The expiration date has not been exceeded
- An accurate Material Safety Data Sheet (MSDS) is available from Industrial Hygiene or the original manufacturer or distributor
- The chemical is no longer needed by the department that owns it.

3.1 Definitions (continued)

Federal Insecticide, Fungicide, and Rodenticide Act of 1972 (FIFRA). The act, as amended in 1978, that establishes regulations for the storage and disposal of pesticides and requirements for informative and accurate labeling FIFRA also specifies acceptance tolerance levels for certain pesticides, and mandates the premarket clearance of pesticides to prevent unreasonable hazards

Hazardous Waste. Waste exhibiting the characteristics of corrosivity, ignitability, reactivity, toxicity, or listed in 6 CCR 1007-3, Parts 2, 99, 100, and 260 through 268

Incidental Release. Release that includes the leaks, spills, or other releases where the substance can be safely absorbed, neutralized, or otherwise controlled by employees or maintenance personnel in the immediate release area at the time of the release Also includes releases of hazardous substances for which there is no potential safety or health hazard (such as, fire, explosion, or chemical exposure) above the normal operating conditions in the work area

Interim Status. The conditions under which existing RCRA-regulated storage and treatment units operate until the Part B Operating Permit is issued by the CDH.

Job Supervisor. The Manager, Supervisor, or a designated person who is responsible for the conduct of a waste evolution

Key Custodians. A group of individuals assigned to have the oversight control of waste management containers and movement of waste containers within the Building 779 Complex

Line Management, Supervisor, or Unit Owner. Personnel in the Building 779 Complex referred to as Functional Managers or Supervisors

List of Qualified Individuals. Personnel who are qualified by the Operations Manager (OM), Associate General Manager, or General Manager to operate, maintain, or supervise activities

3.1 Definitions (continued)

National Emissions Standards for Hazardous Air Pollutants (NESHAPs). The emission standards set by the EPA for an air pollutant not covered by the National Ambient Air Quality Standards (NAAQS) that may cause an increase in deaths or a serious, irreversible, or incapacitating illness Primary standards are designed to protect human health; secondary standards are designed to protect the public welfare NESHAPs limit the radiation dose from airborne radionuclide emissions from DOE facilities to 10 millirems per year (mrem/yr) effective dose equivalent to the public

National Environmental Policy Act of 1970 (NEPA). The act, under the implementation of the Council on Environmental Quality, that required any project affecting the environment and requiring a Federal permit or using Federal lands or funding to prepare and submit an Environmental Impact Statement (EIS). The EIS was meant to quantify the anticipated environmental impact and the potential benefits of the proposed activity, and to describe and compare alternatives

Occupational Safety and Health Act (OSHA). The act implemented in 1970 that protects the health and safety of employees in the work place

Permitted Storage Area. Storage area authorized by a valid State RCRA permit

Qualification Standard Package (QSP). Document containing the Qualification Card, Qualification Standard, and Procedure Knowledge Verification This document contains all requirements necessary for individuals to qualify for respective positions

Release. Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, or dumping in any building or containment or to the environment

Resource Conservation and Recovery Act (RCRA). The Federal law originally passed in 1976 and subsequently amended in 1984 which, in part, addresses the generation, transportation, treatment, storage, and disposal of hazardous waste in order to protect human health and the environment

3.1 Definitions (continued)

RFP Emergency Plan (RFP EPLAN). A DOE-required document that provides the emergency management program requirements necessary to protect personnel, property, and production capability from harm, and to mitigate the impact of credible emergency situations on RFP operations The RFP EPLAN provides for the establishment of procedures to ensure effective coordination of RFP Emergency Operations with Emergency Operations of Federal, State, and local agencies

RFP RCRA Contingency Plan. A document that outlines the response and reporting procedures to be followed for an incident involving the potential for hazards to human health or the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, surface, or groundwater The RCRA Contingency Plan is required by the CDH to meet requirements stated in 6 CCR 1007-3, Parts 264 50 and 265.50 This plan is in compliance with Federal requirements listed in 40 CFR Section 264, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, and Section 265, Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage A response at the RFP may be coordinated with regional emergency response teams

Superfund Amendments and Reauthorization Act (SARA). The 1986 act that is an extension of the CERCLA program to clean up hazardous releases at uncontrolled or abandoned hazardous waste sites. SARA allows the government to take immediate action and seek reimbursement later SARA provides funding for site cleanup where no responsible party with sufficient funds can be found SARA also imposes on the EPA a schedule for site investigations, feasibility studies, and remedial action, and establishes community right-to-know provisions

Toxic Substances Control Act (TSCA). The act, enacted in 1976, that regulates the introduction and use of new hazardous chemicals and the manufacture, processing, use, and disposal of all chemical substances by requiring the testing of potentially harmful chemicals

3.1 Definitions (continued)

Underground Storage Tanks (UST). Any tank or combination of tanks, including associated underground piping, that is used to contain an accumulation of petroleum products and the volume of which, including associated underground piping, is 10% or more beneath the surface of the ground

Waste Container. Department of Transportation (DOT)-approved serialized drum or crate for holding waste items

Waste and Environmental Management System (WEMS) An integrated computer system designed to perform the major data processing functions associated with waste management and minimization at RFP WEMS is used as a part of the Operating Record to track and control the inventory and movement of radioactive, nonradioactive, hazardous, nonhazardous, and mixed waste containers

2D Integrated Work Control Program IWCP The number 2 indicates an urgent priority level assigned by the OM to a Deficiency Report or Work Request This urgent priority level requires rapid action to ensure safety to personnel or the environment The letter D classification indicates repairs or modifications to environmental regulatory compliance facilities, systems, or hardware

3.2 Acronyms

APEN	Air Pollutant Emission Notice
CCO	Chemical Control Officer
CDH	Colorado Department of Health
CDRR	Controlled Document Revision Request
DMR	Document Modification Request
DOE	Department of Energy
DOT	Department of Transportation
EPA	Environmental Protection Agency
HSWA	Hazardous and Solid Waste Amendments
IDC	Item Description Code
IWCP	Integrated Work Control Program
LDR	Land Disposal Restriction
MSDS	Material Safety Data Sheet
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NMC	Nuclear Material Control
NOI	Notice of Inspection
PATS	Plant Action Tracking Systems
RCPM	Reactive Chemical Program Manager
RFP	Rocky Flats Plant
SAN	Safeguard Accountability Network
UST	Underground Storage Tanks
WEMS	Waste and Environmental Management System
WSRIC	Waste Stream and Residue Identification and Characterization

4. RESPONSIBILITIES

4.1 Building 779 Operations Manager

Ensures the safe and proper supervision, monitoring, operation, and maintenance of assigned buildings, systems, and areas

Maintains authority over tenant organizations working in respective facilities for the scheduling of tasks, allocations of resources, and compliance with the Conduct of Operations Manual requirements

Acts on all problems, occurrences, emergencies, and other matters affecting the respective facilities including curtailing or suspending operations when undue risks to health, safety, or the environment are identified

Coordinates with functional (line) managers to maintain RCRA Units in accordance with applicable regulations and RFP policies, including the designation of RCRA Custodians, performing required inspections, and taking action to investigate, report and correct all identified procedural violations.

Coordinates with functional (line) managers to certify waste streams that are identified for functional operations in the building

Coordinates with functional (line) managers to provide oversight to training programs and guidance for personnel

Assigns a Building Emergency Preparedness Administrator to coordinate emergency preparedness activities, building drills, and other building emergency activities with the functional (line) managers and the RFP Emergency Preparedness organization

Makes the appropriate response to problems arising from any source in the assigned facilities

Ensures that the appropriate response personnel are notified of problems arising from any source in the assigned facilities

4.1 Building 779 Operations Manager (continued)

Informs senior management of problems arising from any source in the assigned facilities

Implements a program for self-evaluation of compliance with applicable RFP procedures and policies

Ensures that identified deficiencies are tracked and corrected in accordance with established policies and procedures

Maintains clear lines of communication with each functional group in the assigned facilities

Provides a work environment that is conducive to excellence, professionalism, and teamwork at all levels

Approves all facility operating procedures

Ensures the control of facility visitors.

Ensures that good housekeeping practices are used throughout the areas of responsibility

Ensures that the employees have received adequate training

Ensures that a list of incidental spill response equipment and supplies (including a description and capability of each item) is maintained for any RCRA Unit, or for other operations within the building that may result in a leak, spill, or other release of hazardous substances, materials, or waste

Approves all movement of waste containers between areas of different line management, foreman, or owner responsibilities

4.2 Environmental Coordinator

Acts as single point of contact for all environmental compliance issues within designated buildings

Advises the OM or the Facility Manager (FM) in all areas of environmental compliance, surveillances, and audits

Maintains the authority for shutdown as delegated for an operation within designated buildings when the operation is not in compliance with applicable environmental requirements

Conducts regulatory area inspections with CDH, EPA, DOE, and EG&G Rocky Flats Inc (EG&G), and completes the appropriate EG&G pre- and post-status requirements.

Ensures that building-specific Floor Level environmental compliance procedures (Level 4) are accurate and include all facility-specific environmental information.

Ensures that the EC Central File System requirements are current and accurate.

Becomes familiar with and communicates, as necessary, the information concerning Contingency Agreements, Compliance Orders, Federal Facility Compliance Agreements, CAA, CWA, TSCA, RCRA, NEPA, NESHAP, SARA, CERCLA, FIFRA, OSHA, and other laws, as applicable to the specific assigned building.

Conducts an area-specific review of training guidelines, (for example, Waste Generator and RCRA Custodian) concerning qualification requirements and documentation

Ensures that Environmental Self-evaluations are conducted, and through internal surveillances, identifies and facilitates corrective actions

Identifies corrective measures, and prepares environmental compliance action plans.

Directs and oversees the closure of RCRA Units.

4.2 Environmental Coordinator (continued)

Assists in identifying and promoting waste minimization and pollution prevention measures

Develops weekly reports on all environmental compliance issues to the Environmental Program Manager (EPM) and the OM

Ensures the proper handling of all regulated waste by periodic observation and inspection of travelers

Prepares and submits monthly compliance reports to the EPM

4.3 Environmental Program Manager

Acts as the primarily liaison between the Regulators, DOE, Director of Plutonium Operations, Environmental Restoration (ER), Environmental Waste Management (EWM), Legal, other Facility Management and Operations (FM&O), and the Environmental and Waste Programs departments

Provides management with the technical guidance for any environmental noncompliance

Prepares and submits monthly environmental reports

Supports ECs in duties to achieve and maintain compliance with all applicable environmental regulations

Meets with ECs to discuss schedules and priorities, and to resolve differences with the OM and the Director

Integrates with other EPMs and other organizations on the implementation of applicable environmental requirements

Reviews the relevant project or program, engineering, and procedure documentation for environmental implications

4.3 Environmental Program Manager (continued)

Requests and organizes the collection of data for environmental reports and permit applications

Provides the technical input for environmental occurrences

Analyzes trends to identify potential conditions adverse to effective environmental multi-media compliance practices

Performs investigations or inquiries of identified concerns, deficiencies, or weaknesses

4.4 Facility Manager

Maintains the oversight of chemical control accountability and inventory of all chemicals used in functional operations within the building

Chairs and controls periodic Waste Generator and RCRA Custodian meetings

Coordinates IWCP priorities by ensuring that the maintenance, radiation protection, and engineering support are available (allocation of resources) to maintain environmental compliance

Controls the container keys in a lock box

Maintains assigned RCRA Units in accordance with all established regulations and policies, to include designating RCRA Custodians, performing required inspections, and taking action to investigate, report, and correct all identified violations

Ensures that operations are conducted and that facilities are operated in accordance with the Conduct of Operations Manual

Maintains authority over, and responsibility for, all facility operations including activities performed by tenant organizations.

4.4 Facility Manager (continued)

Maintains clear lines of communication with management and operations personnel in assigned facilities

Ensures the control of facility visitors during the shift

Verifies that personnel are Waste Generator-qualified

4.5 Key Custodian

NOTE *The number of authorized Key Custodians will be minimized*

Ensures that the Waste Generator has a current Waste Generator Qualification Badge.

Signs the Key Custodian Log to record possession of the container key

Signs off as the verifier on the Waste/Residue Traveler when a second generator of the package is not available

Allows only authorized and compatible waste to be placed in the container

Verifies that waste containers are controlled by ensuring the containers are properly locked unless waste is being added or removed

Controls all incidental wastes at the Building 779 Step-off Pad.

4.6 Limiting Conditions for Operations (LCO) Tracking Coordinator

Maintains the emergency generator test results

Maintains the Building 779 Complex Vital Safety System records and schedules.

4.7 Line Management, Foreman, or Unit Owner

Ensures that the waste generated during spill cleanup activities is properly characterized, handled, packaged, marked, labeled, stored, treated, and transported in accordance with applicable RFP procedures

Oversees, directs, and coordinates all Key Custodian activities

Provides guidance to Key Custodians when questions arise

Approves receipt of waste into the facility and shipment of waste from the facility

Acknowledges the ownership and responsibility for assigned accumulation areas

Responds to problems incurred at the assigned site

Ensures the compliance with environmental laws and regulations in the conduct of operations and activities within the area of responsibility

Ensures that Waste Generators within the organization are current regarding specified training requirements

Reviews inspection logsheets for accuracy

Evaluates deficiencies documented in evaluations performed in the respective management area

Ensures that Waste Generators within respective organizations generate waste in accordance with applicable RFP procedures.

Ensures that modifications or alterations to any part of the process and tenant areas are approved by the OM

Ensures that routine inspections of process areas are completed so that deficiencies in any process area can be reported to the OM for corrective action.

4.7 Line Management, Foreman, or Unit Owner (continued)

Notifies the EC and the EPM on all environmental issues pertaining to their area of responsiblity

Maintains the chemical control accountability and inventory of all chemicals used within areas of responsiblities

Implements waste minimization programs where possible

Initiates and submits to the OM any IWCP forms for building deficiencies, repairs, or maintenance, as needed

Approves and ensures the performance of waste container movements within areas of responsibility

Completes the appropriate forms, and ensures that the containers are moved to or from the appropriate staging areas for shipments into or from the facility.

Ensures that container inspections are conducted before shipment from the facility.

Reports the status of corrective actions taken as a result of findings in evaluations conducted within their respective management area

Ensures that the contents of waste containers are consistent with the waste or residue stream as identified in the Waste Stream and Residue Identification and Characterization (WSRIC) Building Book, and that the waste container is packaged in accordance with 5-23000-WRP-WO-1100, Radioactive Waste Packaging inside the PA, 5-23000-WRP-WO-1102, Waste/Residue Traveler Instructions, and 1-10000-WRM-WO-4034, Radioactive Waste Packaging Requirements

Coordinates waste shipments and container movements with Key Custodians, NMC, and the WEMS building representative

Coordinates the movement of transferring containers between the building and Transportation

4.8 Personnel

Complete training as required to become Waste Generator and RCRA Custodian qualified.

4.9 Resource Conservation and Recovery Act Unit Custodian

Manages the operation of, and initiates changes and modifications to, a RCRA Unit to ensure compliance with applicable local, State, and Federal laws

Initiates changes and modifications as needed to ensure the accuracy of the WEMS report in accordance with 1-10000-HWR, Hazardous Waste Requirements Manual

Performs or assigns a qualified designee to perform inspections of the RCRA Unit.

Reviews the information on the posted Unit Information Sheet (UIS) to ensure that the information and equipment are accurate, complete, and consistent

4.10 Training Manager (TM) or Plant Training Records (PTR)

Schedules and conducts training in accordance with 1-10000-TUM, Training User's Manual

Maintains training schedule and completion records

Coordinates with the OM, FM, or other individuals to ensure that all personnel who work in the complex are on the Training Scheduling Records (TSR) database

4.11 Waste and Environmental Management System Coordinator

Enters and maintains the WEMS, and ensures that all of the container information meets RCRA guidelines

Responds to WEMS container information and location report requests

Performs self-assessment verification, and makes corrections when deficiencies are found

4.12 Waste Generators

Handle and manage waste in accordance with applicable RFP procedures

Minimize waste to the greatest extent possible

Accurately complete the Waste/Residue Traveler

Review the WSRIC Building Books to ensure the characterization accuracy of the waste being generated

Characterize waste through process knowledge, analytical data, or the WSRIC Building Books

Notify supervision of any problems or deficiencies

Ensure that all prerequisite training is complete and up-to-date

Intiates a CDRR

5. PERFORMANCE DOCUMENTS

Line Management and EC

[1] Ensure that the following documents are available in the work area or in the EC Central File System

- Building 779 Building Emergency Plan
- Building 779 Final Safety Analysis Report (FSAR)
- Building 779 Health and Safety Plan
- Colorado RCRA Permit Modification Drafts
- Colorado RCRA Permit Part A and Part B
- Consent Agreements and Orders
- DOE Order 5280 2A, Radioactive Waste Management
- EG&G Rocky Flats Quality Assurance Manual
- Operations Orders, Shift Orders, and Standing Orders for Environmental Compliance
- WSRIC Books for Buildings 705, 706, T706A, 727, 729, 782, 783, 784, 785, 786, 787, 779, T779A, 779A, and 779B
- 1-B44-HSP-9 12, Chemical Tracking
- 1-10000-EWQA-1 1, Low Level Waste Management Plan
- 1-10000-EWQA-1.5, TSCA Management Plan
- 1-10000-HWR, Hazardous Waste Requirements Manual
- 1-10000-WRM-WO-4034, Radioactive Waste Packaging Requirements
- 1-10000-WRM-WP-1027, Nonradioactive Waste Packaging
- 1-11000-ADM-16 10, Self Evaluation Program
- 1-20000-SAN-001, Sanitary Waste Handling Requirements
- 1-20000-WPC-001, Waste Process Control Procedure
- 1-23000-WMM-001, Miscellaneous Waste Materials Management
- 1-25000-EPR-NEPA, 001, Implementation of NEPA Documentation
- 5-23000-WEM, Waste and Environmental Management System
- 5-23000-WEM-WP-1201, Waste and Environmental Management System (WEMS) Container Inventory, Tracking, and Control
- 5-23000-WRP-WO-1100, Solid Radioactive Waste Packaging Inside the PA
- 5-23000-WRP-WO-1102, Waste/Residue Traveler Instructions
- 5-23000-WRP-WP-2401, Asbestos Waste Management .

5. PERFORMANCE DOCUMENTS (continued)

- 6 CCR 1007-3, Colorado Hazardous Waste Regulations
- 40 CFR, Protection of the Environment, Subpart I, Solid Wastes
  § Section 262, Standards Applicable to Generators of Hazardous Waste
  § Section 263, Standards Applicable to Transporters of Hazardous Waste
  § Section 264, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities
  § Section 265, Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage
- 49 CFR, Transportation, Parts 171 through 177

6. INSTRUCTIONS—TRAINING

NOTE *Additional information is in 1-10000-TUM.*

6.1 Qualification Standard Package

NOTE 1 *The QSP for Waste Generators or RCRA Custodians is divided into the following sections*

- *Part I Basic Training*
- *Part II: Formal Training*
- *Part III Theoretical Knowledge Verification*
- *Part IV. Review and Qualification*
- *Section I Qualification Standard - Theoretical Knowledge Verification*
- *Section II Qualification Standard - Walkthrough Training/Performance Evaluation*
- *Section III Qualification Standard - Procedure Knowledge Verification*
- *Addendums, as required*

NOTE 2 *The completed QSP is a document used to certify that personnel are qualified*

NOTE 3 *The following instructions provide the details on how to complete and properly document the qualification process. The supervisor, TM, or designee may be contacted for additional information.*

TM or Designee

[1] Label each page of the QSP with the employee's name to ensure that any separated pages will be returned to the correct package

[2] **IF** a course number is incorrect,
THEN

[A] Use one line to mark out the incorrect number

6.1 Qualification Standard Package (continued)

[B] Record the proper course number as close to the lined-out incorrect number as possible

[C] Initial and date the correction in accordance with 1-31000-COOP-006, Operating Area Logs and Records

[3] Record all completion dates as the actual date training was attended and as recorded in the TSR database

[4] Record the date as the following are performed
- Interviews
- Walkthrough training
- Performance evaluations

[5] **IF** the class is **NOT** current on the TSR database,
AND proof of attendance is produced by a classroom roster or training receipt which was signed by the instructor,
THEN

[A] Record the date listed on the roster or training receipt in the appropriate area.

[B] Indicate an R for roster or an IR for instructor receipt next to the date

[C] Notify Performance Based Training (PBT) of all corrections of the TSR database

6.2 On-the-Job Training (OJT) Instructor Requirements

Line Management, Foreman, or Unit Owner

[1] Verify that personnel identified as OJT Instructors successfully meet the following minimum requirements

- RFP Qualification Process
- Waste Generator Qualification

The required OJT is performed at the actual RCRA Units that the Waste Generator will be using

6.3 Assurance of Qualified and Trained Personnel

NOTE *Office workers and administrative personnel complete only the annual RCRA computer-based training*

FM or Line Management

[1] State, during the Plan of the Day (POD), that all personnel must be Waste Generator-qualified before generating waste

TM or designee

[2] Issue qualified Waste Generators and RCRA Custodians a card verifying that all training and qualification requirements have been completed

[3] Submit completed QSPs to PTR

[4] File a copy of the completed QSP with the PTR document transmittal form.

[5] Ensure that PTR updates the database against completed QSPs

[6] Ensure that PTR file completed QSPs

6.4 Verification of Training

The following training verifications apply to ensure that only qualified personnel or properly prepared trainees are assigned to work in the operating areas of the buildings covered by this procedure

Line Management, Foreman, or Unit Owner

[1] **IF** the prerequisite training is **NOT** available on the employee's assigned shift, **THEN** perform one of the following

[A] Temporarily assign new personnel to the day shift.

[B] Ensure that the employee does not generate waste

[2] **WHEN** a pre-evolutionary briefing is held,
THEN

[A] Determine which individuals will be generating waste.

[B] Ensure that individuals generating waste have completed Waste Generator Qualification and possess a current Waste Generator Qualification card

[C] Ensure that Waste Generators, who are not a resident of the building, are aware of the location of the WSRIC Building Books and the Waste Requirements Procedures in the Material Access Area (MAA) of Building 779

[3] **IF** individuals generating waste have **NOT** completed Waste Generator Qualification,
THEN assign a qualified Waste Generator to work with these individuals.

TM or Line Management

[4] Deliver a QSP to all new personnel within 1 mo after arrival, as required

[5] Forward letters to affected supervision 1 mo in advance for personnel requiring requalification, as required.

7. INSTRUCTIONS—ADMINISTRATIVE SITUATIONS

7.1 Interaction with Regulatory Agencies

EC

[1] Ensure that the requirements for escorting representatives of regulatory agencies on tours and inspections, contained in the 1-D41-HWRM-22, Interaction with Environmental Regulatory Agencies and Enforcement Inspectors, are met

[2] Conduct a pre-evolutionary briefing before the tour covering detailed information about the areas to be visited and proper protocol

[3] Ensure that a knowledgeable building representative is present during tours to answer safety and technical questions

7.2 Commitment Tracking

OM, RCRA Custodians, Line Management, Foreman, or Unit Owner

[1] Enter all deficiencies that are identified as environmental noncompliances into the Plant Action Tracking System (PATS) in accordance with 1-11000-ADM-16 10, Self-Evaluation Program

[2] Enter all 2D IWCPs which are regulatory environmental noncompliance deficiencies into the PATS

7.3 Document Changes and Additions

7.3.1 Controlled Document Revision Request (CDRR)

Waste Generator

[1] Perform one of the following

[A] Initiate a CDRR to revise the WSRIC Building Books

[B] Request a process number for a waste in accordance with 2-20000-ADM, E&WM Administrative Procedure Manual

7.3.1 Controlled Document Revision Request (CDRR) (continued)

EC

[2] Forward the CDRR to the appointed Waste Identification and Characterization contact, the group performing the service of updating the WSRIC Building Book

7.3.2 Document Modification Request (DMR)

Waste Generator

[1] **WHEN** an inconsistency is identified in a document or procedure,
THEN submit a DMR to the EC in accordance with 1-A01-PPG-001, Procedure Process

[2] Work with the Responsible Manager of a procedure to update the applicable procedure(s).

8. INSTRUCTIONS—EC CENTRAL FILE SYSTEM

EC or designee

[1] Maintain the Central File System in the Building 779 Complex.

[2] Organize the Central File System to correspond with the titles identified in Appendix 1, Central File Self-evaluation Checklist

[3] Review the Central File System for accuracy on a monthly basis using Appendix 1, and correct any inaccuracies

All items in the Central File System are controlled by the date of generation or revision, unless controlled by other procedures

[4] Ensure that the Central File System contains the items listed in Table 1, Central File System Contents, or an explanation of where the item can be found

TABLE 1, CENTRAL FILE SYSTEM CONTENTS

Item Number	Description	Governing Act	Source
1	A list of all RCRA sites	RCRA	Contained in the WEMS database or generated by the EC
2	A building(s) map(s) that includes the location of all RCRA sites, evacuation (egress) routes, phone locations, fire extinguishers, and spill cabinets (kits)	RCRA	EC
3	A Key Custodian list of personnel authorized to unlock containers	RCRA	OM, FM
4	A list of RCRA Custodians, Waste Generators, and ECs that includes qualification date and job title	RCRA	PTR, TM
5	Instructions for completing UIS and Inspection Logsheets (or as provided in 1-10000-HWR)	RCRA	EC

8. INSTRUCTIONS—EC CENTRAL FILE SYSTEM (continued)

NOTE 1 *Up to 1 mo past daily Inspection Logsheets are kept at the site or in the RCRA Custodian's office, available for immediate inspection.*

NOTE 2 *Daily Inspection Logsheets 1 mo old or older are kept in the EC Central File System or in the RCRA Custodian's office.*

NOTE 3 *Up to 3 mo past weekly Inspection Logsheets are kept at the site or in the RCRA Custodian's office, available for immediate inspection.*

NOTE 4 *Weekly Inspection Logsheets 3 mo old or older are kept in the EC Central File System or in the RCRA Custodian's office.*

NOTE 5 *Reports may be kept with the Unit Owners*

TABLE 1, CENTRAL FILE SYSTEM CONTENTS (continued)

Item Number	Description	Governing Act	Source
6	A copy of all UISs	RCRA	EC
7	The original Inspection Logsheets for all RCRA and TSCA units, except for those at the site or in the RCRA Custodian's office	RCRA	RCRA Custodians
8	A list of all expired, excess, and unknown chemicals, and a description of the status	SARA/RCRA	Chemical Control Officer (CCO) or designee
9	A copy of the current building chemical inventory	SARA	CCO or designee
10	A copy of the WEMS Container Accuracy Report or Operating Record Report for Permitted Storage Areas	RCRA	WEMS Coordinator

8. INSTRUCTIONS—EC CENTRAL FILE SYSTEM (continued)

TABLE 1, CENTRAL FILE SYSTEM CONTENTS (continued)

Item Number	Description	Governing Act	Source
11	A log containing status information and monthly inspection reports (as required by 1-23000-WMM-001, Miscellaneous Waste Materials Management) for the discovered containers	RCRA	EC or SM
12	The status of all sample requests	RCRA	Sample Management Office
13	A copy of all Envirograms and guidance letters applicable to the facility	All	EC
14	An accountability or contact list that includes the job title, name, building, phone number, and pager number for each of the following (a) CCO (b) Clean Air Manager (c) Clean Water/Surface Water Manager (d) EC (e) EPM (f) Functional Manager(s) (g) Industrial Hygienist (h) NEPA Manager (i) OM (j) Operable Unit Managers (k) Radiological Engineer (l) Shift Superintendent (m) TM (n) WEMS Coordinator	All	OM

8. INSTRUCTIONS—EC CENTRAL FILE SYSTEM (continued)

TABLE 1, CENTRAL FILE SYSTEM CONTENTS (continued)

Item Number	Description	Governing Act	Source
15	A current organization chart that establishes ECs	RCRA	Director, Plutonium Operations
16	Copies of the open PATS lists that include tasks and action plans	All	PATS Coordinator
17	A copy of the maintenance schedule that reflects the IWCP status of all environmental deficiencies	All	OM
18	Copies of open EG&G Waste Surveillance reports	All	PATS Coordinator
19	Outside agency reports that include Notice of Inspections (NOIs) by the CDH and the EPA	All	EC
20	Copies of open DOE Waste Surveillance reports	All	PATS Coordinator
21	Any open Contingency Plans and Implementation Reports	RCRA	Waste Programs
22	List of open Nonconformance Reports pertaining to environmental deficiencies only	All	Standards, Audits and Assurance
23	Land Disposal Restriction (LDR) Information	RCRA	EC
24	Ground Water Monitoring Reports	RCRA	Surface Water Division (SWD)
25	Closure Plans	RCRA	Operations/Waste Regulatory Programs
26	TSCA Information	TSCA	EC
27	SARA Title III Information	SARA	EC
28	FIFRA Information	FIFRA	EC
29	NEPA Information	NEPA	EC
30	CAA Information	CAA	EC
31	CWA Information	CWA	EC

8. INSTRUCTIONS—EC CENTRAL FILE SYSTEM (continued)

TABLE 1, CENTRAL FILE SYSTEM CONTENTS (continued)

Item Number	Description	Governing Act	Source
32	CERCLA Information	CERCLA	EC
33	UST Information	UST	EC
34	Idle Equipment/Excess Material	RCRA	EC
35	Central File Self-evaluation Checklist	All	EC

EC

[5] **IF** the safety inspection reports and annual fire prevention inspection reports of permitted units need to be reviewed,
THEN contact the Fire Department.

[6] **IF** the radiological information needs to be reviewed,
THEN contact Radiological Operations or Radiological Engineering

[7] **IF** the emergency generator test results need to be reviewed,
THEN contact the LCO Tracking Coordinator

[8] **IF** the security inspection reports of permitted units need to be reviewed,
THEN contact Wackenhut Services Incorporated or the Facility Security Manager

[9] **IF** the list of spill response equipment needs to be reviewed,
THEN contact the RCRA Custodian

9. INSTRUCTIONS—HAZARDOUS (RCRA) OR NONHAZARDOUS WASTE

9.1 Waste Minimization

Minimizing wastes is the most effective way to reduce hazardous waste handling costs and future hazardous waste liabilities The Hazardous and Solid Waste Amendments direct Waste Generators to implement waste minimization programs As Congress intended Waste Generators to voluntarily reduce wastes, the regulations do not specify the actions that are to be taken to reduce hazardous waste or the amount of reduction which must be achieved However, waste minimization provisions are included in manifests and in biennial reports

EC and Waste Generators

[1] Understand and practice the five waste minimization methods currently being used at RFP

- Substitution

  This method replaces a chemical that generates a hazardous waste with another chemical which does not have hazardous waste constituents

- Recycle or Reuse

  This method recovers or regenerates material that is inherent in a product that has reached the end of its usable life

- Reduction

  This method purposely alters a process to eliminate or significantly reduce the generation of hazardous waste

- Treatment

  This is any designed process to change the chemical, physical, or biological nature of a hazardous waste

9.1 Waste Minimization (continued)

- Segregation

  This method does not intentionally combine hazardous waste with any other waste

9.2 Waste Determination

This section applies to nonroutine waste identification resulting from a new or modified process Information on routinely generated waste is in the WSRIC Building Book

Waste Generators

[1] Follow requirements outlined in 1-C75-HWRM-03, Waste Identification and Analysis

9.3 Control of Drum Keys and Waste Containers

Line Management, Foreman, or Unit Owner

[1] Ensure that the following manuals are at the location listed

First Floor Building 779 Room 133	• Building 779 WSRIC Book • 1-10000-WRM-WO-4034 • 5-23000-WRP-WO-1100 • 5-23000-WRP-WO-1102
Second Floor Building 779 Room 274	• Building 779 WSRIC Book • 1-10000-WRM-WO-4034 • 5-23000-WRP-WO-1100 • 5-23000-WRP-WO-1102
Building 779 Annex Room 153	• Building 779 WSRIC Book • 1-10000-WRM-WO-4034 • 5-23000-WRP-WO-1100 • 5-23000-WRP-WO-1102

9.3 Control of Drum Keys and Waste Containers (continued)

The following steps provide guidance on the accumulation of all waste generated in Building 779 Complex that requires packaging in accordance with applicable packaging procedures

FM

[2] Assign one Prime Contact Key Custodian and one Alternate Key Custodian during the all hands morning meeting

[3] Post the names of the Prime Contact Key Custodian and Alternate Key Custodian in the lobby of Building 779

[4] Inform the representative Key Custodian of the planned evolutions for the day during the POD

Waste Generators

[5] Request an empty waste container from the Key Custodian and a representative from NMC

[6] Receive the empty waste container

NOTE *The responsible person is the same person listed in Block 2 of the Waste/Residue Traveler.*

Key Custodian

[7] Complete the WEMS Container Worksheet indicating where and who will be responsible for the waste container

[8] Ensure that NMC transfers the empty waste container from the empty account to an active account within the Safeguards Accountability Network (SAN).

Waste Generators

[9] Prepare the empty waste container in accordance with 5-23000-WRP-WO-1100.

9.3 Control of Drum Keys and Waste Containers (continued)

NOTE 1 *Any qualified Key Custodian may be contacted to access any waste container.*

NOTE 2 *Container keys are located in a locked box in the office of the FM, Building 779, Room 207 B.*

Key Custodian

[10] Sign the Key Custodian Log for the drum keys as the keys are issued.

Line Management, Foreman, or Unit Owner

[11] Ensure that there is access to all waste containers

NOTE 1 *All personnel generating waste are required to be Waste Generator-qualified or escorted by a qualified Waste Generator.*

NOTE 2 *A Key Custodian list is posted on the Information Board in the lobby of Building 779*

FM

[12] Control the drum keys in the Building 779 Complex

Key Custodian

[13] Verify that the Waste Generator has a Waste Generator Qualification Badge.

[14] **IF** the Waste Generator does **NOT** have a Waste Generator Qualification Badge, **THEN** immediately notify the Building 779 FM

[15] Verify the accuracy of the information in the WSRIC Building Book for the designation of each package to be placed in the waste container

9.3 Control of Drum Keys and Waste Containers (continued)

[16] **IF** the information in the WSRIC is inaccurate,
THEN

[A] Notify the Building 779 EC.

[B] Initiate a CDRR

[17] Notify the RCT to perform the required surveys

[18] **WHEN** the RCT has completed the required surveys,
AND approval has been given for waste to be placed in the waste container,
THEN unlock and open the waste container

NOTE *Item Description Code (IDC) 330 non-line generated waste in the Radiological Control Area (RCA) is monitored by a Radiological Control Technician (RCT) to ensure that the waste is not contaminated before placing the waste in the trash compactor in Building 779, Room 153.*

Waste Generator

[19] Place the non-contaminated and the non-hazardous combustibles (IDC 330) waste in the trash compactor

[20] **IF** the compactor is full,
THEN notify a Key Custodian to access a waste container

Line Management, Foreman, or Unit Owner

[21] Ensure that only authorized waste is placed into the correct waste container

Waste Generator

[22] **WHEN** a waste container is full,
THEN:

[A] Close the waste container in accordance with 5-23000-WRP-WO-1100.

9.3 Control of Drum Keys and Waste Containers (continued)

[B] Apply a TID in accordance with 5-23000-WRP-WO-1100

[C] Ensure that the Waste/Residue Traveler is completed and signed in accordance with 5-23000-WRP-WO-1102

[D] Complete a WEMS Container Worksheet.

[E] Ensure that the WEMS Coordinator updates the WEMS database

Key Custodian

[23] Package the waste in accordance with 5-23000-WRP-WO-1100 or 1-10000-WRM-WP-1027

[24] Sign as the verifier on the Waste/Residue Traveler, unless another qualified Waste Generator is performing the verification

[25] Ensure that the waste container is controlled by assuring that the waste container is closed and locked

Waste Generators

[26] **IF** the waste generated is mixed or hazardous,
THEN ensure that the Onsite Hazardous Waste Label has been completed in accordance with the applicable WSRIC Building Book

[27] Move the waste container to a staging area for shipment to a counter

9.4 Control of Waste Containers and Waste Generated at the Building 779 Complex Step-off Pad

NOTE *Nonqualified Waste Generators (for example, vendors or visitors) can be granted permission to perform work only by the OM or an alternate The exempted person is accompanied by a qualified Waste Generator who can verify proper waste identification and disposal.*

Line Management and Supervisors

[1] Ensure that a waste container, located in the vicinity of the Step-off Pad for collection of non-line, non-mixed dry combustible waste, IDC 330, is never left unattended

NOTE *The RCT is only allowed to collect tape, surgeon's gloves, and smear papers at the Step-off Pad*

[2] Ensure that waste is picked up and deposited in the trash compactor located in Room 153A each shift of each working day.

Waste Generators or Key Custodian

[3] Ensure that personnel placing waste in the Step-off Pad waste container are Waste Generator qualified or are accompanied by a qualified Waste Generator escort.

9.5 Spill Response

Personnel

[1] Understand and comply with the release response instructions in 1-62200-HSP-21 04, Emergency Response and Spill Control and in 1-C49-HWRM-04, Release Response and Reporting

9.6 Management Review of RCRA Accumulation Area Inspection Logsheets

NOTE 1 *Inspection Logsheets for Accumulation Areas are legal records of the compliance status of the area when the inspection is conducted.*

NOTE 2 *1-10000-HWR and the specialized inspection procedures provide instructions for completing Inspection Logsheets.*

NOTE 3 *To ensure RCRA compliance, the personnel conducting weekly or daily inspections are to notify responsible supervision as soon as the inspection is complete*

RCRA Custodian

[1] Transfer the Inspection Logsheet to the responsible Line Management, Foreman, or Unit Owner

Line Management, Foreman, or Unit Owner

[2] Review the Inspection Logsheet for the following:

- The inspection was completed within the specified time interval
- All corrections on the Inspection Logsheet are indicated by a single line through the entry, initialed, dated, and the correct entry made.
- All NO responses are explained, and the appropriate corrective actions documented on the Inspection Logsheet
- Corrective actions are repeated on each Inspection Logsheet until the deficiency is corrected.
- All changes in response from the previous Inspection Logsheet are explained on the new logsheet

[3] Sign the Inspection Logsheet in the supervisor box

[4] Indicate a follow-up on all previously identified deficiencies

[5] Ensure that the deficiency closure is noted in the Comments sections.

9.6 Management Review of RCRA Accumulation Area Inspection Logsheets (continued)

NOTE *Repetitive deficiencies that are corrected within 24 hr do not require Appendix 2, RCRA Inspection Management Follow-up, to be completed.*

[6] **IF** corrective actions are necessary,
THEN:

[A] Complete Appendix 2.

[B] Deliver Appendix 2 to the FM

The form is completed the first time a deficiency is noted, and remains active until the deficiency is corrected Subsequent reviews that identify concerns with the lack of timely corrective action are documented on a new form that references the initial identification

FM

[7] **IF** an IWCP is required,
THEN record the Work Control Form (WCF) number on Appendix 2.

[8] Document the actions taken on Appendix 2

[9] Deliver Appendix 2 to the OM

OM

[10] Review Appendix 2

[11] Sign and forward Appendix 2 to the EC

OM or EC

[12] Review Appendix 2 weekly to ensure that appropriate attention is focused on the timely correction of deficiencies

9.6 Management Review of RCRA Accumulation Area Inspection Logsheets (continued)

EC

[13] Perform the following weekly

[A] Record the results of the review on the back of Appendix 2

[B] Sign and date the results of the review on the back of Appendix 2

[C] Report the results to the responsible supervisors

[14] File Appendix 2 in the EC Central File System

9.7 <u>Disposal of Nonradioactive or Non-RCRA-regulated/Nonhazardous Sanitary Waste Water</u>

NOTE *These steps provide guidance on the proper disposal and shipment of waste water*

Waste Generator

[1] Dispose of sanitary waste water in accordance with 1-10000-WRM-WP-1027

A light green, 55-gal closed-head (bung type) waste container is used to collect the following types of waste water before disposal to a sanitary waste drain

- Nonradioactive
- Non-RCRA
- Non-TSCA regulated
- Non-toxic sanitary

[2] Do **NOT** overfill the drums

The freeboard space required from the liquid to the bung opening is 6 inches

9.7 Disposal of Nonradioactive or Non-RCRA-regulated/Nonhazardous Sanitary Waste Water (continued)

[3] Attach a Caution Sign identifying the drum contents to the drum when put in use

Proper placement of the sign is on the side, within the upper one-third of the drum

Sanitary waste water, non-RCRA, nonradioactive, non-TSCA, nontoxic signs, as depicted in Appendix 3, Caution Sign, page 1 of 2, are used on green drums

[4] Place a locking lid on each waste water drum

Sanitary waste water drums in the RCA are controlled by a Key Custodian

Stationary Operating Engineers (SOEs) control the sanitary waste water drums outside the RCA

[5] Initiate a WEMS Container Worksheet on each new sanitary waste container

[6] Deliver the WEMS Container Worksheet to the Building RCRA Custodian or designee

Key Custodian

[7] Ensure that the pH of the sanitary waste water is between 2 and 12 5 before the sanitary waste water is deposited into the drum

RCRA Custodian or designee

[8] Complete a Waste Processing Request Form

[9] Notify the sampling team

9.7 Disposal of Nonradioactive or Non-RCRA-regulated/Nonhazardous Sanitary Waste Water (continued)

[10] **WHEN** the analytical results are available,
THEN coordinate the transfer of the sealed sanitary waste containers

9.8 Disposal of Non-RCRA-regulated Waste Water in a Radiological Controlled Area (RCA)

NOTE *These steps provide guidance on the proper disposal and shipment of exempt fissile or non-RCRA-regulated waste water.*

Waste Generator

[1] Dispose of waste water in accordance with 1-10000-WRM-WO-4034

A white, closed-head (bung type) 55-gal waste container is used for compatible liquids in a RCA

[2] Do **NOT** overfill the drums

The freeboard space required from the liquid to the bung opening is 6 inches

[3] Attach a Caution Sign identifying the drum contents to the drum when put in use

Proper placement of the sign is on the side, within the upper one-third of the drum

Exempt Fissile Material & Non-RCRA Regulated Waste signs, as depicted in Appendix 3 page 2 of 2, are used on white drums

[4] Place a locking lid on each waste water drum

Waste water drums in the RCA are controlled by a Key Custodian. SOEs control the waste water drums outside the RCA

9.8 Disposal of Non-RCRA-regulated Waste Water in a Radiological Controlled Area (RCA) (continued)

[5] Initiate a WEMS Container Worksheet on each new waste container

[6] Deliver the WEMS Container Worksheet to the RCRA Custodian or designee

Key Custodian

[7] Ensure that the pH of the waste water is between 2 and 12 5 before the waste water is deposited into the drum

Waste Generator

[8] **WHEN** a white drum reaches capacity,
THEN:

[A] Sign and date a Custody Seal

[B] Attach the Custody Seal to the top of the drum (bung)

RCRA Custodian or designee

[9] Complete a Waste Processing Request Form

[10] Notify the sampling team

[11] **WHEN** the analytical results are available,
THEN coordinate the transfer of the sealed waste containers

9.9 Reactive Chemical Control

Personnel

[1] Identify a potentially reactive chemical

[2] Immediately notify supervision and the EC of the suspected potentially reactive chemical

9.9 Reactive Chemical Control (continued)

Line Management or Foreman

[3] Notify the owner of the suspected potentially reactive chemical

Unit Owner

[4] Evaluate the chemical

[5] **IF** the chemical is stable,
THEN provide the appropriate documentation

[6] **IF** the chemical is reactive or **CANNOT** be determined,
THEN

[A] Minimize the handling and movement

[B] Post a warning sign

[C] Restrict access to the area

[D] Make a solid waste determination

[7] **IF** the determination is made that the chemical is hazardous waste or a suspected hazardous waste,
THEN

[A] Begin the 90-day clock

[B] Manage the chemical as hazardous waste, in a 90-day accumulation area.

[C] Notify the Reactive Chemical Program Manager (RCPM) to perform the following

[a] Evaluate the chemical, and consult with the prime contractor for reactive chemicals, as necessary.

9.9 Reactive Chemical Control (continued)

[b] Provide guidance to the owner on special hazards and precautions.

[c] Forward a letter to the following
- Owner
- EC
- OM

[d] Add the chemical to the itinerary for next testing and stabilization.

FM

[8] Maintain a Building Reactive Chemicals Log containing the following information
- Date of discovery
- Unit Owner's name
- Description of the chemical
- Location of the chemical
- Final disposition

9.10 Receiving Hazardous Waste Containers

NOTE 1 *Containers of hazardous or mixed waste may be staged on a transfer dock for no longer than 24 hr after delivery.*

NOTE 2 *Docks are inspected when RCRA-regulated materials are being staged to ensure that no spills or releases have occurred.*

NOTE 3 *All receiving operations are performed in accordance with 1-63200-NMT-002, Transfer of Category III and IV Special Nuclear Material*

RCRA Custodian

[1] **IF** the waste to be received is RCRA-regulated,
THEN

[A] Ensure that an Onsite Hazardous Waste Label (RF-47257) has been completed

[B] Ensure that the entries on the Onsite Hazardous Waste Label agree with the entries on the Waste/Residue Traveler or Drum Label

[2] **IF** the entries on the Onsite Hazardous Waste Label do **NOT** agree,
THEN reject the container

[3] Ensure that the EPA Codes on the Onsite Hazardous Waste Label are allowed in the Building 779 Complex RCRA Storage Units in accordance with the EPA Log maintained by the RCRA Custodian

[4] **IF** the EPA Codes are **NOT** permitted in the Building 779 Complex RCRA Storage Units,
THEN reject the container

[5] Ensure that the nonconforming container is segregated from the conforming containers by arranging to have the nonconforming container moved to a designated holding area

9.10 Receiving Hazardous Waste Containers (continued)

[6] Verify each entry on the WEMS Container Accuracy Report.

[7] **IF** an entry is incorrect,
THEN complete a WEMS Container Worksheet

WEMS Coordinator

[8] Enter information about the container from the WEMS Container Worksheet into the WEMS database

RCRA Custodian

[9] **WHEN** the containers arrive at the receiving dock,
THEN notify the following
- WEMS Coordinator
- Representative from NMC
- Key Custodian
- Line Management

[10] **WHEN** the containers are removed from the truck,
THEN ensure that NMC performs the following

[A] Compare each container against the Nuclear Material and Drum Transfer Report (NMDTR) for the following
- Container number
- Extended number (prefix or serial number)
- Tamper-Indicating Device (TID) number(s)

[B] Sign the NMDTR

[11] **WHEN** the containers are received into the building,
THEN complete the WEMS Container Worksheet

9.10 Receiving Hazardous Waste Containers (continued)

WEMS Coordinator or Designee

[12] Enter all information about the container from the WEMS Container Worksheet into the WEMS database

[13] Verify that the information is correct

9.11 Transferring Hazardous Waste Containers

NOTE 1 *Containers of hazardous mixed waste may be staged on a transfer dock for no longer than 24 hr after delivery.*

NOTE 2 *Docks are inspected when RCRA-regulated materials are being staged to ensure that no spills or releases have occurred.*

NOTE 3 *All transferring operations are performed in accordance with 1-63200-NMT-002*

Line Management or Foreman

[1] Provide the RCRA Custodian with a list of each container to be transferred

RCRA Custodian, Line Management, or Foreman

[2] Notify each RCRA Custodian in each building where each waste container is to reside.

[3] Verify each container number to be transferred

[4] Coordinate the date and time for each building to receive the waste containers

[5] Notify Line Management or the Foreman of the date and time to ship the waste containers

[6] Complete the Transfer/Receiving Report

[7] Schedule the shipment of the containers on the POD

9.11 Transferring Hazardous Waste Containers (continued)

[8] Ensure that the waste containers are moved to the dock for shipment.

[9] Complete a container worksheet

[10] Ensure that the waste containers on the dock with RCRA-regulated hazardous materials are staged so no spills or releases occur

RCRA Custodian

[11] **IF** the waste containers contain RCRA-regulated waste,
THEN ensure that the waste containers are transferred before exceeding the 24-hr dock limit

[12] Notify Waste Inspection to perform dock inspection

[13] **IF** Waste Inspection personnel do **NOT** approve the waste container,
THEN do **NOT** ship the container, unless corrections are made

[14] **WHEN** Waste Inspection personnel approve the waste container,
THEN.

[A] Complete the Dock Inspection Sheet to ship hazardous or mixed waste or residues

[B] Complete the WEMS Container Worksheet

[C] Ensure that the WEMS Coordinator has a copy of the WEMS Container Worksheet

WEMS Coordinator or Designee

[15] Enter all information from the WEMS Container Worksheet into the WEMS database

[16] Verify that the information is correct

9.12 Moving Hazardous Waste Containers within the Building 779 Complex

NOTE *Internal container movements are performed in accordance with appropriate building specific procedures and Shift Orders.*

RCRA Custodian

[1] Obtain the weekly Waste Storage Inventory Report and known processing schedules

[2] Request that the WEMS Coordinator query WEMS for storage inventory status in accordance with 5-23000-WEM-WP-1201, Waste and Environmental Management System (WEMS) Container Inventory, Tracking, and Control

[3] Ensure that applicable RCRA Units are in compliance with the State RCRA permit and interim status storage requirements.

[4] Arrange for moving waste containers out of the Building 779 Complex areas, as necessary, to avoid exceeding the permitted and interim status storage limits

[5] Obtain the Line Management's approval to move waste containers from one Line Management or Foreman's area of responsibility to another Line Management or Foreman's area of responsibility

[6] Determine if an incompatibility exists by comparing the compatibility codes of the waste containers' Onsite Hazardous Waste Label to the Compatibility Code Reference

[7] **IF** incompatibilities exist between the waste,
THEN

[A] Ensure that the stored incompatible waste within the RCRA Unit is separated by a dike, berm, wall, or other device

[B] Notify supervison or the EC.

9.12 Moving Hazardous Waste Containers within the Building 779 Complex (continued)

[8] Determine if the EPA Codes on the waste containers' Onsite Hazardous Waste Label and EPA Codes shown in WEMS are consistent and allowed, and will not exceed the permitted and interim status requirements.

[9] **IF** the EPA Codes on the waste container are **NOT** allowed, **THEN** take corrective actions as necessary

Line Management or Foreman

[10] Ensure that a WEMS Container Worksheet is completed before the movement of a waste container

RCRA Custodian

[11] Complete the WEMS Container Worksheet

[12] Ensure that the WEMS Coordinator has a copy of the WEMS Container Worksheet

WEMS Coordinator or Designee

[13] Enter all information from the WEMS Container Worksheet into the WEMS database

[14] Verify that the information is correct.

[15] Notify NMC to perform the following

[A] Complete and maintain the Drum Status Report daily

[B] Notify and provide copies of any completed NMDTR to the WEMS Coordinator for data entry into the WEMS within 1 working day

10. INSTRUCTIONS—TOXIC SUBSTANCES CONTROL ACT

TSCA was enacted to regulate chemical substances and mixtures which present an unreasonable risk of injury to health or the environment, and to take action with respect to chemical substances and mixtures which are imminent hazards. At this time, the substance present at RFP which is regulated under TSCA is Polychlorinated Biphenyls (PCBs) Therefore, the TSCA regulations which govern chemical manufacturing, selling, and distribution for use are not applicable to RFP

TSCA regulates PCB manufacturing, processing, distribution in commerce, and disposal, and provides for use prohibitions and authorizations PCB regulations govern generators, users, owners, transporters, or disposers, and require an identification number for regulated facilities Most PCB wastes are regulated under TSCA, not RCRA, however, some PCB wastes contain both RCRA- and TSCA-regulated constituents For this waste, the requirements of both TSCA and RCRA apply

NOTE *Part 763 of TSCA establishes the Federal Requirements for asbestos abatement projects Requirements set forth for the regulation of friable asbestos are included in the NESHAPs as part of the CAA and are mentioned in Section 14, Clean Air Act, of this Guide.*

RFP is currently in the process of trying to eliminate the use of all PCBs. PCB waste is managed in accordance with 1-10000-EWQA-1 5, TSCA Management Plan The TSCA Program Administrator for Waste Programs is contacted if specific packaging questions arise

EC

[1] Follow instructions in future revisions

11. INSTRUCTIONS—SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT-TITLE III

EPCRA and SARA Title III are synonymous Section 312 of the Emergency Planning and Community Right-To-Know Act of 1986 (EPCRA) requires that RFP submit an emergency and hazardous chemical inventory form to the Local Emergency Planning Committee (LEPC), Boulder and Jefferson Counties; the State Emergency Planning Committee (SEPC), and the RFP Fire Department The inventory form (known as a Tier II reporting form) includes chemicals for which MSDSs are required under OSHA Hazardous Communication Standards and that were present at the facility at any time during the previous calendar year above specific thresholds.

The purpose of SARA Title III is to establish the presence of toxic or hazardous chemicals at a particular site with various community emergency response authorities In so doing, the community is better protected from exposure should a disaster occur at a regulated site (for example, a fire which could cause a release of hazardous constituents into the air) Emergency response teams know what chemicals are present and can be appropriately prepared to handle an emergency.

Facilities that use listed toxic chemicals in excess of 10,000 lb in a calendar year file a Toxic Chemical Release Inventory Form (known as Form R) each year.

EC

[1] Follow instructions in future revisions

12. INSTRUCTIONS—FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT

FIFRA is the Federal environmental statute that covers the use of chemicals that are used to control unwanted pests, insects, and microbes. FIFRA controls these types of chemicals by controlling manufacture, use, and disposal Although RFP does not manufacture FIFRA-regulated chemicals, a FIFRA program exists to monitor and reduce use

At RFP, FIFRA is managed as part of the Watershed Management Program under the supervision of the SWD of the Environmental Protection Management Department The goal of the program is to develop best management practices for the use and storage of FIFRA regulated chemicals onsite To ensure that pesticides do not enter the watershed, SWD tracks their use, storage, and disposal SWD also studies developing alternative methods of pest control, such as bug release programs and physical trapping of pests There are no state permits required for RFP under FIFRA

EC

[1] Follow instructions in future revisions

13. INSTRUCTIONS—NATIONAL ENVIRONMENTAL POLICY ACT

NEPA is a short, general statute that declares a national environmental policy and promotes the consideration of environmental concerns by Federal agencies It requires no permits, but Federal agencies conduct an impact analysis of major Federal actions for environmental concerns Such an analysis results in an Environmental Impact Statement (EIS) While preparation of an EIS is a multi-year task, there are preliminary steps to determine whether or not an EIS is actually required. Such steps include various levels of project review up to and including an Environmental Assessment (EA). An EA concludes that either an EIS is required or there is a Finding of No Significant Impact (FONSI)

EC

[1] Follow instructions in future revisions

14. INSTRUCTIONS—CLEAN AIR ACT

The CAA was enacted in 1963 and extensively amended in 1970, 1977, and 1990. The CAA set standards for ambient air quality and hazardous air pollutants At RFP, compliance programs have been established for radioactive and nonradioactive hazardous emissions and ambient air conditions

At the RFP, CAA requirements and compliance issues are programmatically controlled and implemented by the Environmental Protection Management, Air Quality Division These programs are blended with DOE requirements and requirements from CDH, APCD

The State Implementation Plan gives emission limitations for existing sources and transportation control plans The plan sets the standard for RFP's permit programs

RFP has the following mechanisms in place to meet CAA and DOE requirements

- 1990 CAA Amendments and the RFP Site-wide Permit
- Ambient monitoring program through the CDH
- APEN Program
- Beryllium emission and the potential for new stock sampling
- Emission Permit Program
- Monthly RFP site inspection by CDH Environmental Protection Management, Air Quality Division
- Radioactive Ambient Air Monitoring Program (RAAMP)
- Radiological NESHAPs

EC

[1] Follow instructions in future revisions

15. INSTRUCTIONS—CLEAN WATER ACT

The EPA sets national effluent limitations and water quality standards, and establishes a regulatory program to ensure enforcement, as outlined in the CWA In Colorado, discharge permits for federal facilities such as RFP are issued by the EPA. The State of Colorado sets water quality standards for receiving streams and bodies of water The standards are applied through National Pollutant Discharge Elimination System (NPDES) permits issued for RFP by the EPA

EC

[1] Follow instructions in future revisions

16. INSTRUCTIONS—COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT

This act is commonly known as Superfund This is a program developed to identify sites where hazardous substances have been, or might be, released into the environment.

This act ensures that the hazardous substances are cleaned up by responsible parties or the government

This act evaluates the damages to natural resources and creates a claims guide for parties who have cleaned up sites or spent money to restore natural resources

EC

[1] Follow instructions in future revisions

17. INSTRUCTIONS—UNDERGROUND STORAGE TANKS

This is a tank or combination of tanks, including associated underground piping, that is used to contain an accumulation of petroleum products

This is a tank or combination of tanks that the volume, including associated underground piping, is 10% or more beneath the surface of the ground

EC

[1] Follow instructions in future revisions

18. RECORDS

EC

[1] Maintain records generated in performance of this guide in accordance with 1-10000-HWR.

[2] Disposition records generated by this guide as Quality Assurance Records in accordance with 1-77000-RM-001, Records Management Guidance for Records Sources

- Appendix 1
- Appendix 2

19. REFERENCES

CDH, APCD Regulation Number 3

Conduct of Operations Manual

Title 42, The Public Health and Welfare, Emergency Planning and Community Right-to-Know Act, Section 312, 1986

1-A01-PPG-001, Procedure Process

1-10000-TUM, Training User's Manual

1-31000-COOP-006, Operating Area Logs and Records

1-62200-HSP-21 04, Emergency Response and Spill Control

1-62300-NMT-002, Transfer of Category III or IV Special Nuclear Material

1-77000-RM-001, Records Management Guidance for Records Sources

2-20000-ADM, E&WM Administrative Procedure Manual

APPENDIX 1
Page 1 of 2

CENTRAL FILE SELF-EVALUATION CHECKLIST

Date of Review _____

	Item - Title of Files	Adequate Yes/No	Reviewer's Initials
1	List of RCRA sites		
2	Building map		
3	Key Custodian list		
4	Qualification list with job titles and dates		
5	Instructions for UIS and Inspection logsheets		
6	UISs		
7	Inspection Logsheets 1 Daily Inspection Logsheets 2. Weekly Inspection Logsheets		
8	List of expired, excess, and unknown chemicals		
9	Building chemical inventory		
10	WEMS report		
11	Discovered Container Log		
12	Sample request status		
13	Envirograms and guidance letters		
14	Contact List		
15	Organization Chart		
16	PATS lists		
17	IWCP status for environmental deficiencies		
18	EG&G Waste Surveillance Reports		
19	Outside Agency Reports and NOIs		
20	DOE Waste Surveillance Reports		
21	Contingency Plan and Implementation Reports		
22	Open nonconformance reports		

APPENDIX 1
Page 2 of 2

Date of Review _____

Item - Title of Files		Adequate Yes/No	Reviewer's Initials
23	LDR Information		
24	Groundwater Monitoring Reports		
25	Closure Plans		
26	TSCA Information		
27	SARA Title III Information		
28	FIFRA Information		
29	NEPA Information		
30	CAA Information		
31	CWA Information		
32	CERCLA Information		
33	UST Information		
34	Idle Equipment/Excess Materials		
35	Central File Self-evaluation Checklist		

Reviewer's Name _____

Reviewer's Signature _____

Comments or Corrective Actions _____

APPENDIX 2
Page 1 of 1

RCRA INSPECTION MANAGEMENT FOLLOW-UP

RCRA INSPECTION MANAGEMENT FOLLOW-UP

UNIT ID NO. _____

DATE OF INSPECTION _____

CORRECTIVE ACTIONS RECOMMENDED ON INSPECTION LOGSHEET:

_____
_____
_____
_____

_____ / _____
RESPONSIBLE SUPERVISOR DATE

ACTION TAKEN: _____
_____
_____
_____
_____

WCF NO. TF

_____ / _____
FACILITY MANAGER DATE

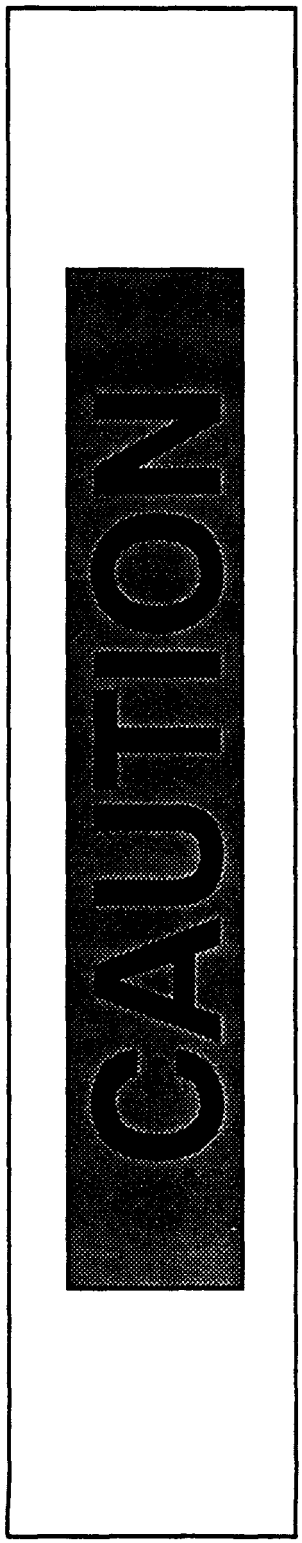
REVIEWED BY: _____ / _____
OPERATIONS MANAGER DATE

DELIVER FORM TO ENVIRONMENTAL COORDINATOR FOR RETENTION IN CENTRAL DATA FILE

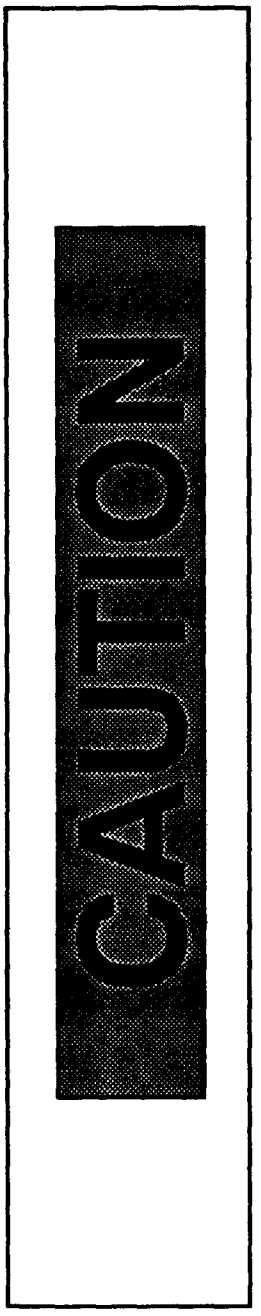
(REVIEW THIS WEEKLY UNTIL ACTION IS COMPLETE)

APPENDIX 3
Page 1 of 2

CAUTION SIGNS



APPENDIX 3
Page 2 of 2



ONLY NON-RCRA REGULATED
WASTE WITHIN THE RADIOLOGICAL
CONTROLLED AREA IS PERMITTED
IN THIS BARREL.

Approved_____
Date _____

Building 779 Complex